

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court
Southern District of Texas
FILED

OCT 10 2014

Clerk of Court

United States of America)

v.)

Case No.

m-14-1968-M

MORENO-Campos, Alma)

YOB:1975)

Citizenship: Mexico)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/9/2014 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC 841 (a) (1)

Knowingly and intentionally possess,
with intent to distribute approximately
105.66 kilograms of marijuana, a
Schedule I controlled Substance under
the Controlled Substance Act.

This criminal complaint is based on these facts:

On October 9, 2014, at approximately 0943 hrs Border Patrol Agent (BPA) Andrew Johnson was conducting lay in operations approximately one mile west of the Progreso, Texas Port of Entry. BPA A. Johnson observed several subjects carrying bundles and loading them into a black Chevrolet Silverado. BPA A. Johnson immediately advised mobile agents the direction of travel of the target vehicle. BPA Pedro Garcia responded to the area from Lion Lake Drive in the Progreso Lakes area, BPA Johnson observed a black Chevrolet Silverado driving north from the Progreso Basins at a high rate of speed. BPA Garcia immediately activated his emergency lights in an attempt to conduct a traffic stop.

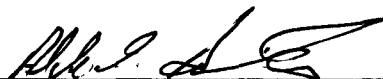
☒ Continued on the attached sheet.

Approved by Joseph T. Leonard

Sworn to before me and signed in my presence.

Date: 10/10/2014

City and state: McAllen, Texas



Complainant's signature

Aldo Benavides Special Agent, DEA

Printed name and title



Judge's signature

Dorina Ramos, U.S. Magistrate Judge

Printed name and title

ATTACHMENT I

BPA Garcia approached the vehicle and observed a female driver making a complete stop. BPA Garcia observed the female driver exit the vehicle along with a male passenger. Both subjects ran south through an open field in attempt to return back to the river area. Without losing visual of the subjects, BPA Garcia immediately advised other mobile agents of the description and direction of travel of both subjects. BPA Garcia described the male passenger wearing a gray shirt and the female driver wearing a black shirt. BPA Elde Garcia and K-9 Felix (0913110) responded and were able to apprehend the male passenger identified as Juan Alejandro ESPARZA-Calva as he was attempting to hide in tall grass. BPA Jared Barton responded and apprehended the female driver identified as Alma MORENO-Campos as she attempted to hide under tall grass near a ditch. A search of the Chevrolet Silverado revealed one bundle in the rear passenger seat and three bundles in the bed of the truck.

The bundles were wrapped in brown cellophane tape, emanated a strong odor to that of Marijuana. The bundles were seized and transported to the Weslaco, Texas Border Patrol Station for further processing by BPA P. Garcia. Once at the station BPA H. Chaney and BPA P. Garcia field tested the green leafy substance located within the bundles using the Narco Pouch 908 Duquenois-Levine Reagent marijuana test kit which tested positive for the presence of marijuana. The four bundles of marijuana had a combined weight of 105.66 kilograms.

On October 9, 2014, DEA Special Agent Aldo Benavides was contacted regarding the seizure and the arrest of two subjects. At approximately 12:15 pm, SA Benavides and SA Behlke responded to the Weslaco Border Patrol Station.

At approximately 12:25 pm, SA Benavides as witnessed by SA Behlke read MORENO her Miranda Rights. MORENO stated she understood her rights and agreed to speak with agents. MORENO stated that she met an individual known to her as Carlos GARCIA a week prior to today's event. MORENO stated GARCIA offered her to transport marijuana from the Rio Grande River to a Wal-Mart Store in Weslaco, TX. MORENO stated that on 10-08-2014, she met GARCIA at her residence and agreed to the offer made by GARCIA. MORENO stated that on the morning of 10-09-2014, GARCIA drove MORENO to the Wal-Mart Store in Weslaco, TX and pointed out a black truck (Black Chevrolet Truck) that was in the parking lot. MORENO stated GARCIA instructed her to take possession of the truck and drive to the river near Progreso, TX and that several individuals would be waiting for her to load her up with marijuana. MORENO stated she followed those instructions arrived to the area near the Border Wall. MORENO stated she also observed several individuals waiting for her and as soon as she stopped the truck, those individuals loaded the bundles of marijuana into the truck. MORENO stated that an individual opened the passenger door and entered the vehicle. MORENO stated she did not know the individual. MORENO stated she drove the vehicle north from the wall and immediately was confronted by Border Patrol Units. MORENO stated she attempted to flee and was apprehended during the course of her actions by Border Patrol. MORENO stated she was going to be paid \$2000.00 dollars for her services. SA Benavides contacted Assistant United States Attorney Leo J. Leo regarding the arrest and seizure and AUSA Leo accepted prosecution on MORENO.

At approximately 12:49 pm, SA Benavides and Behlke interviewed the second subject (Juan Alejandro ESPARZA-Calva). Based on the interview conducted by Agents, AUSA Jimmy Leo declined prosecution on ESPARZA.